

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CHAMBERS OF  
STEVEN C. MANNION  
UNITED STATES MAGISTRATE JUDGE

MARTIN LUTHER KING  
COURTHOUSE  
50 WALNUT ST.  
ROOM 2064  
NEWARK, NJ 07101  
973-645-3827

August 26, 2016

**LETTER OPINION/ORDER**

**Re: D.E. 262, Plaintiff's Motion to Compel Discovery  
United States of America *ex rel.* Bahnsen, *et al.* v. Boston Scientific  
Civil Action No. 11-cv-1210 (JMV)(SCM)**

Dear Counsel:

Pending before this Court is a discovery dispute raised by Plaintiff/Relators, Wendy Bahnsen and Carolina Fuentes ("Relators") concerning an allegedly deficient production of documents by Defendant, Boston Scientific Neuromodulation Corporation ("Boston Scientific").<sup>1</sup> After review of the parties' joint submission, the Court has the following questions:

- 1) When were Relators or their counsel initially informed about the "Zirned" database?
- 2) When were Relators or their counsel initially informed about the Medisoft database?
- 3) When were Relators or their counsel initially informed about the Dataflo database?
- 4) Did Defense counsel provide an enclosure letter (or email) or written document response for the March 13, 2015 production of the "claims data" spreadsheet? If so, provide a copy with your response.

Counsel for the parties shall file their respective written responses (maximum three pages each) to these questions no later than 5:00 p.m. on September 9, 2016. For each response, counsel shall provide pinpoint citations to the docket or attach a copy of the proofs upon which they rely to support their respective client's position.

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<sup>1</sup> (ECF Docket No. ("D.E.") 262).

Counsel shall appear for a status conference with me in Courtroom 2B on September 23, 2016  
at 2:00 p.m.

**SO ORDERED.**



A handwritten signature in black ink that reads "Steven C. Mannion".

Honorable Steve Mannion, U.S.M.J.  
United States District Court,  
for the District of New Jersey  
phone: 973-645-3827

8/26/2016 2:33:34 PM

Original: Clerk of the Court  
Hon. John M. Vasquez, U.S.D.J.  
c (via ECF): All Counsel